

**IN IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
MARSHALL DIVISION**

**DISPLAY TECHNOLOGIES, LLC,**

Plaintiff,

v.

**NVIDIA CORPORATION, *et al.*,**

Defendants.

**Civil Action No. 2:15-cv-998-JRG-JRP**

**CONSOLIDATED LEAD CASE**

**JURY TRIAL DEMANDED**

**MOTION FOR CLERK'S ENTRY OF DEFAULT**

Plaintiff Display Technologies, LLC (“Display”) hereby requests that the Clerk of the above-entitled Court enter default in this matter against defendant NVIDIA Corporation (“Defendant”) on the ground that Defendant failed to appear or otherwise respond to Display’s Complaint within the time prescribed by the Federal Rules of Civil Procedure. Display served its Complaint and Summons in this matter upon Defendant on June 19, 2015, as evidenced by the Return of Service Executed on file with this Court (Dkt. No. 13).

The above stated facts are set forth in the accompanying Affidavit of Krystal L. McCool filed herewith.

DATED April 21, 2016.

Respectfully submitted,

By: /s/ Stevenson Moore

Hao Ni

Texas Bar No. 24047205

hni@nilawfirm.com

Timothy T. Wang

Texas Bar No. 24067927

twang@nilawfirm.com

Neal G. Massand

Texas Bar No. 24039038

nmassand@nilawfirm.com

Stevenson Moore V

Texas Bar No. 24076573

smoore@nilawfirm.com

Krystal L. McCool

Texas Bar No. 24082185

kmccool@nilawfirm.com

**Ni, Wang & Massand, PLLC**

8140 Walnut Hill Ln., Ste. 500

Dallas, TX 75231

Tel: (972) 331-4600

Fax: (972) 314-0900

**ATTORNEYS FOR PLAINTIFF  
DISPLAY TECHNOLOGIES, LLC**

**CERTIFICATE OF SERVICE**

I hereby certify that on the 21st day of April, 2016, I electronically filed the foregoing document with the clerk of the court for the U.S. District Court, Eastern District of Texas, Marshall Division, using the electronic case filing system of the court. The electronic case filing system sent a "Notice of Electronic Filing" to the attorneys of record who have consented in writing to accept this Notice as service of this document by electronic means.

/s/ Stevenson Moore

Stevenson Moore